

JAMES A. ORONOS, ESQ.
Nevada Bar No. 6769
ORONOS & ERICSSON, L.L.C.
700 SOUTH 3RD STREET
Las Vegas, Nevada 89101
Telephone: (702) 878-2889
Facsimile: (702) 522-1542
jim@oronoslalwers.com
Attorney for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NAVAZ DOWLING,

Defendant.

2:12-CR-0082-MMD-VCF

**UNOPPOSED MOTION TO CONDUCT A
PRE-PLEA PRESENTENCE
INVESTIGATION REPORT AND
PROPOSED ORDER**


COMES NOW, defendant, NAVAZ DOWLING, by and through his counsel, JAMES A. ORONOS, ESQ., and hereby moves this Court for an Order granting the instant motion for a Pre-Plea Presentence Investigation Report to be prepared by the United States Department of Parole and Probation.

1. It is counsel's understanding that Mr. Dowling has been convicted of a felony offense outside of Nevada. Counsel is unaware of any additional convictions. Accordingly, counsel believes that Mr. Dowling has a Criminal History Category of I. Mr. Dowling's Criminal History Category will drastically impact his sentencing exposure, negotiations, and his decision as to how he should proceed in this matter. A pre-plea presentence investigation report will promote judicial economy and aid in the manner in which this case is timely resolved.

DISTRICT OF NEVADA

Defendant.

ORDER


UNITED STATES DISTRICT JUDGE

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that I am an employee of Oronoz & Ericsson L.L.C. and is a person of such age and discretion as to be competent to serve papers.

That on August 8, 2012, I served an electronic copy of the above and foregoing UNOPPOSED MOTION TO CONDUCT A PRE-PLEA PRESENTENCE INVESTIGATION REPORT AND PROPOSED ORDER by electronic service (ECF) to the person(s) named below:

DANIEL G. BOGDEN
United States Attorney
333 Las Vegas Blvd. South, #5000
Las Vegas, NV 89101
Counsel for United States

KIMBERLY FRAYN
Assistant United States Attorney
333 Las Vegas Blvd. South, #5000
Las Vegas, NV 89101
Counsel for United States

/s/ Lucas Gaffney, Esq.
Employee of Oronoz & Ericsson L.L.C.